

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRANDON SMETANA, SKYCOIN
GLOBAL FOUNDATION LIMITED, a
Singapore Company, and SYMBOLIC
ANALYTICS INC., a Delaware Corporation,

Plaintiffs,

v.

BRADFORD STEPHENS, AARON
KUNSTMAN, JOEL WAYNE CUTHRIELL,
MORGEN PECK, CATHERINE BYERLY,
ADVANCE MAGAZINE PUBLISHERS
INC., d/b/a THE NEW YORKER, and
UNKNOWN INDIVIDUALS AND
COMPANIES,

Defendants.

Civil Action No. 1:24-cv-08617

Judge: Hon. John Robert Blakey

Magistrate Judge: Hon. Keri L. Holleb
Hotaling

PLAINTIFFS' MOTION FOR ALTERNATIVE SERVICE

NOW COME the Plaintiffs, BRANDON SMETANA, SKYCOIN GLOBAL FOUNDATION LIMITED, a Singapore Company, and SYMBOLIC ANALYTICS, INC., a Delaware Corporation (collectively "Plaintiffs"), by and through their attorneys, Barney & Karamanis, LLP, and respectfully move this Honorable Court for entry of an Order granting alternative service means for service of civil process of Summons and Third Amended Complaint at Law upon the Defendants, BRADFORD STEPHENS ("Stephens") and MORGEN PECK ("Peck"), via posting, publication, and certified and regular mail. In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs filed their Complaint at Law on April 4, 2024 in the Circuit Court of Cook County, Illinois as Case No. 2024L003661 and on June 11, 2024 an Order Appointing Special Process Server (Judicial Attorney Services) was entered.

2. This matter was removed to the Northern District of Illinois on September 18, 2024.

3. Since June 12, 2024, service on Stephens was attempted on numerous occasions at 1649 N. Fairfield Avenue, Chicago, IL 60647, but Plaintiffs' process server was advised that the address was a rented Airbnb. *See* Exhibit A.

4. Stephens is a party to a divorce proceeding pending in the Circuit Court of Cook County. Stephens' filings in the divorce proceeding indicate that he lives at the Fairfield Avenue address.

5. Since June 11, 2024, service upon Morgen Peck was attempted on four different occasions, with the process server being unable to gain entry into her residence located at 76 Canal Street, 5th Floor, New York, NY 10002 and was advised that "this is an old tenement building with a storefront on the ground level and apartment units above. The entrance to the apartments is locked. There are no bells, no directory and no names listed." *See* Exhibit B.

6. Service was attempted on March 27, 2025 and April 8, 2025 at Morgen Peck's presumed employer The Wall Street Journal located at 1211 Avenue of the Americas, New York, NY and was advised that Morgen Peck did not work there. Ex. B.

7. A skip trace was initiated with Judicial Attorney Services and confirmation was made that 76 Canal Street, 5th Floor, New York, NY is indeed the residential address for Morgen Peck. Ex. B.

8. Based on the foregoing, it is clear that Stephens and Peck are avoiding service.

9. To date, Plaintiffs have been unable to effectuate service on Stephens and Peck.

10. This Court's assistance is needed to move this case forward through the litigation process through ordering alternative service means.

WHEREFORE, Plaintiffs, BRANDON SMITANA, SKYCOIN GLOBAL FOUNDATION LIMITED, a Singapore Company, and SYMBOLIC ANALYTICS, INC., a Delaware Corporation (collectively “Plaintiffs”), by and through their attorneys, Barney & Karamanis, LLP, pray that this Honorable Court enter an Order granting alternative service means for service of civil process of Summons and Third Amended Complaint at Law upon the Defendants, BRADFORD STEPHENS and MORGEN PECK via posting, publication, and certified and regular mail, and for whatever other and further relief this Court deems just and fair.

Respectfully submitted,

BARNEY & KARAMANIS, LLP

/s/James A. Karamanis

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